

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*, §
§
§
Plaintiffs, §
v. § Case No. 3:21-cv-00259-DCG-JES-JVB
§ [Lead Case]
§
§
GREG ABBOTT, *et al.*, §
§
§
Defendants. §

JOINT NOTICE REGARDING PROPOSED JOINT EXHIBITS

Plaintiff groups Brooks, Gonzalez, MALC, LULAC, NAACP, and Intervenors¹ and State Defendants (“the Parties”) file this notice to the Court that the Parties have exchanged proposed exhibit lists, including proposed joint exhibits. The Parties have identified substantial duplication within and among the proposed joint exhibits and continue collaborating to de-duplicate prior to filing the proposed joint exhibit list. The Parties anticipate the de-duplication process will be complete by the middle of next week, whereafter the Parties intend to file a complete and de-duplicated joint exhibit list.

The Parties will file their non-joint exhibit lists with the Court in accordance with the Court’s scheduling order. ECF 880.

¹ Plaintiff Fischer did not respond to correspondence conferring on this notice, but Plaintiffs have jointly provided their proposed joint exhibits to State Defendants, and Plaintiff Fischer has provided State Defendants with his proposed non-joint trial exhibits.

Date: May 2, 2025

KEN PAXTON
Attorney General

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

RYAN D. WALTERS
Deputy Attorney General for Legal
Strategy

Respectfully submitted,

/s/ William D. Wassdorf
RYAN G. KERCHER
Chief, Special Litigation Division
Tex. State Bar No. 24060998

KATHLEEN T. HUNKER
Deputy Chief, Special Litigation Division
Tex. State Bar No. 24118415

WILLIAM D. WASSDORF
Deputy Chief, General Litigation Division
Tex. State Bar No. 24103022

OFFICE OF THE ATTORNEY GENERAL OF TEXAS
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
ryan.kercher@oag.texas.gov
kathleen.hunker@oag.texas.gov
will.wassdorf@oag.texas.gov

/s/ Nina Perales
Nina Perales
Julia Longoria
Sabrina Rodriguez
Mexican American Legal Defense and Educational Fund
(MALDEF)
110 Broadway Street, Suite 300
San Antonio, TX 78205
(210) 224-5476
Fax: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org
srodriguez@maldef.org

Ernest I. Herrera
Mexican American Legal Defense and Educational Fund
(MALDEF)
634 S. Spring Street, 9th Floor
Los Angeles, CA 90014
(210) 629-2512

eherrera@maldef.org

Khrystan N. Policarpio
Mexican American Legal Defense and Educational Fund
(MALDEF)
1512 14th Street
Sacramento, CA 95814
(916) 444-3031
kpolicarpio@maldef.org

Counsel for LULAC Plaintiffs

/s/ David R. Fox

David R. Fox (pro hac vice)
ELIAS LAW GROUP LLP
250 Massachusetts Ave. NW, Suite 400
Washington, D.C. 20001
Telephone: (202) 968-4490
dfox@elias.law

Counsel to Gonzales Plaintiffs

/s/ Gary L. Bledsoe, Esq.

Gary L. Bledsoe, Esq.
The Bledsoe Law Firm, PLLC
6633 E. Highway 290, Suite 208
Austin, Texas 78723-1157
Tel (512) 322-9992
Fax (512) 322-0840
gbledsoe@thebledsoelawfirm.com

Nickolas A. Spencer, J.D., MA.
Attorney and Counselor at Law
Spencer & Associates, PLLC.
808 Travis Street, Suite 100
Houston, TX 77002
nas@naslegal.com
713-863-1409

Counsel for Intervenors

/s/ Lindsey B. Cohan

Lindsey B. Cohan
Texas Bar No. 24083903
DECHERT LLP
515 Congress Avenue, Suite 1400
Austin, TX 78701
(512) 394-3000
lindsey.cohan@dechert.com

Counsel for NAACP Plaintiffs

/s/ Sean J. McCaffity

Sean J. McCaffity
State Bar No. 24013122
smccaffity@textrial.com
George (Tex) Quesada
State Bar No. 16427750
Quesada@textrial.com
3811 Turtle Creek Blvd., Suite 1400
Dallas, Texas 75219-4461
214-720-0720 (Telephone)
214-720-0184 (Facsimile)

Counsel for MALC Plaintiffs

/s/ Chad W. Dunn

Chad W. Dunn (Tex. Bar No. 24036507)
Brazil & Dunn
4407 Bee Caves Road
Building 1, Ste. 111
Austin, TX 78746
(512) 717-9822
chad@brazilanddunn.com

/s/ Mark P. Gaber

Mark P. Gaber*
Mark P. Gaber PLLC
P.O. Box 34481
Washington, DC 20043
(715) 482-4066

mark@markgaber.com

Jesse Gaines* (Tex. Bar. No. 07570800)
P.O. Box 50093
Fort Worth, TX 76105
817-714-9988
gainesjesse@ymail.com

Molly E. Danahy*
P.O. Box 51
Helena, MT 59624
(406) 616-3058
danahy.molly@gmail.com

Sonni Wakinin*
10300 Venice Blvd. # 204
Culver City, CA 90232
732-610-1283
sonniwakinin@gmail.com
*Admitted *pro hac vice*

Counsel for Brooks Plaintiffs

CERTIFICATE OF CONFERENCE

The above signatories have conferred and agreed on this notice. Counsel for Plaintiff Fischer did not respond to the Parties' correspondence regarding this notice.

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 2, 2025 and that all counsel of record were served by CM/ECF.

/s/Ryan G. Kercher
RYAN G. KERCHER